

1 Dale K. Galipo, Esq. (Bar No. 144074)  
2 dalekgalipo@yahoo.com  
3 Renee V. Masongsong, Esq. (Bar No. 281819)  
4 rvalentine@galipolaw.com  
5 LAW OFFICES OF DALE K. GALIPO  
6 21800 Burbank Blvd., Suite 310  
7 Woodland Hills, CA 91367  
8 Tel: (818) 347-3333 / Fax: (818) 347-4118

9 Kevin S. Conlogue, Esq. (SBN 285277)  
10 Kevin@LOKSC.com  
11 CONLOGUE LAW, LLP  
12 8383 Wilshire Blvd.  
13 Beverly Hills, CA 90211  
14 Tel: (213) 255-8837

15 *Attorneys for Plaintiffs*

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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

DAISY ALVAREZ, individually and as  
successor in interest to Ricardo Andrade,  
deceased,

Plaintiffs,

v.

CITY OF PASADENA, et al.

Defendants.

Case No.: 2:25-cv-02490

*District Judge Michael W. Fitzgerald*

**JOINT STIPULATION TO ALLOW  
PLAINTIFF TO AMEND  
COMPLAINT TO NAME THE  
INDIVIDUAL OFFICERS IN PLACE  
OF DOE DEFENDANTS 1-3**

*[Proposed Order; Exhibit A (redlined  
amended complaint; Exhibit B (clean  
amended complaint) filed concurrently  
herewith]*

1 **TO THIS HONORABLE COURT:**

2 **IT IS HEREBY STIPULATED** by and between Plaintiff Daisy Alvarez, and  
3 Defendants CITY OF PASADENA (“the Parties”), by and through their respective  
4 attorneys of record, as follows:

- 5 1. Plaintiff filed her Complaint on March 3, 2025. At the time of the filing of  
6 their Complaint, Plaintiff was genuinely ignorant of the names of the City  
7 of Pasadena Police Department employees and/or individuals who used  
8 force during the incident giving rise to this lawsuit. Subsequently,  
9 Plaintiff has discovered information that Officers John Lewy, Calvin  
10 Blake, and Taylor Vincent are the City of Pasadena Police Department  
11 employees who used force against the decedent during the incident giving  
12 rise to this lawsuit.
- 13 2. The Parties agree that Plaintiff may file an amended complaint for the  
14 purpose of naming Officers John Lewy, Calvin Blake, and Taylor Vincent  
15 as individual defendants in place of Doe Defendants 1-3. A copy of  
16 Plaintiff’s proposed First Amended Complaint (redlined) is attached hereto  
17 as “Exhibit A.” A copy of Plaintiff’s proposed First Amended Complaint  
18 (clean) is attached hereto as “Exhibit B.”
- 19 3. Counsel for the City of Pasadena agrees to accept service of the First  
20 Amended Complaint on behalf of the City of Pasadena.
- 21 4. Plaintiff shall have 7 days to file their First Amended Complaint after the  
22 Court grants her leave to do so. Defendant City of Pasadena shall have 21  
23 days thereafter to file a responsive pleading.

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25 **IT IS SO STIPULATED.**  
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1 DATED: July 30, 2025

**LAW OFFICES OF DALE K. GALIPO**

2  
3 By: s/ Renee V. Masongsong

4 Dale K. Galipo

5 Renee V. Masongsong

6 *Attorneys for Plaintiff*

7 DATED: July 30, 2025

CONLOGUE LAW, LLP

8 /s/ Kevin S. Conlogue

9 Kevin S. Conlogue

10 Ashley M. Conlogue

11 *Attorneys for Plaintiff*

12 DATED: July 30, 2025

**BURKE, WILLIAMS & SORENSEN, LLP**

13  
14 By: /s/ Caylin Jones

15 Nathan A. Oyster

16 Caylin W. Jones

17 Attorney for Defendant

18 CITY OF PASADENA